

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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MACK TRUCKS, INC.,	)	
	)	
Plaintiff,	)	Civil Action No. 2:07-cv-3737-RBS
	)	
v.	)	
	)	
INTERNATIONAL UNION, UNITED	)	R. BARCLAY SURRICK
AUTOMOBILE, AEROSPACE	)	
& AGRICULTURAL IMPLEMENT	)	
WORKERS OF AMERICA-UAW, et al.,	)	
	)	JOINT MOTION FOR FINAL
Defendants.	)	APPROVAL
	)	OF CLASS ACTION SETTLEMENT
MARTIN RACHILLA, JOSEPH E.	)	
CRAIG, JR., JOHN R. WAHLER,	)	
RONALD L. ROYER, DOROTHY	)	
GANTZ, CHARLES CULLEY DAVID	)	
MOORE, on behalf of themselves and a	)	
similarly situated class, and	)	
INTERNATIONAL UNION, UNITED	)	
AUTOMOBILE, AEROSPACE &	)	
AGRICULTURAL IMPLEMENT	)	
WORKERS OF AMERICA – UAW,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	
	)	
MACK TRUCKS, INC., and MACK	)	
TRUCKS, INC. RETIREE WELFARE	)	
BENEFIT PLAN,	)	
	)	
Defendants.	)	

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The Parties, on behalf of themselves, respectfully submit this Joint Motion for Final Approval of Class Action Settlement. Pursuant to Rule 23 of the Federal Rules of Civil Procedure, and for the reasons set forth in the attached Memorandum of Law, the Parties respectfully request that this Court grant final approval of the Settlement Agreement

proposed in this matter.

Respectfully submitted,

SACHS WALDMAN P.C.

By: /s/ Andrew Nickelhoff

Andrew Nickelhoff

Marshall J. Widick

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Dated: August 24, 2011

Attorneys Mack Trucks, Inc.